

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

-v.-

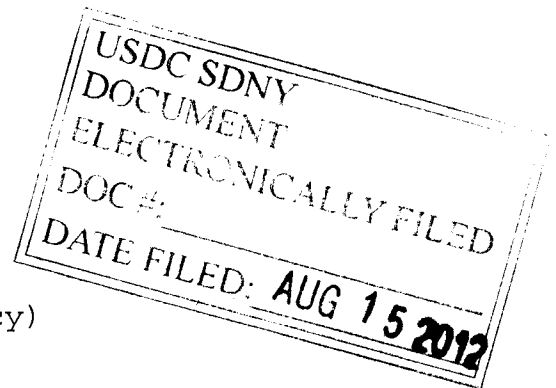
DARRELL EZELL,  
a/k/a "Man,"

Defendant.

- - - - - X

INDICTMENT

**12 CRIM 632**



COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about March 2012, up to and including on or about July 17, 2012, in the Southern District of New York and elsewhere, DARRELL EZELL, a/k/a "Man," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that DARRELL EZELL, a/k/a "Man," the defendant, would and did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances involved in the offense were (a) 1 kilogram and more of mixtures and substances containing a detectable amount of heroin, and (b) 5 kilograms and more of mixtures and substances containing a detectable amount of

JUDGE OETKEN

cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of 21 U.S.C. § 841(b)(1)(A).

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 12, 2012, in Philadelphia, Pennsylvania, DARRELL EZELL, a/k/a "Man," the defendant, met with a co-conspirator not named as a defendant herein and discussed transactions in cocaine.

b. In or about May 2012, EZELL traveled to California for the purpose of meeting his narcotics supplier.

c. On or about July 16, 2012, EZELL and another co-conspirator not named as a defendant herein drove from Yonkers, New York, to Queens, New York, for the purpose of engaging in a narcotics transaction.

d. On or about July 17, 2012, in Queens, New York, EZELL possessed a backpack containing approximately 5 kilograms of heroin.

(Title 21, United States Code, Section 846.)

### FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offenses alleged in Count One of this Indictment, DARRELL EZELL, a/k/a "Man," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendants obtained directly and indirectly as a result of the offense and any and all property used and intended to be used in any manner and part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

### Substitute Assets Provision


6. If any of the above-described forfeitable property, as a result of any act or omission of the said defendant:

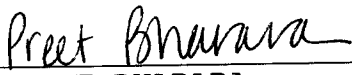
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;  
or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v -

DARRELL EZELL,  
a/k/a "Man"

Defendant.

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INDICTMENT

12 Cr.

(Title 21, United States Code,  
Sections 846 and 853.)

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PREET BHARARA  
United States Attorney.

A TRUE BILL

*Linda G. [Signature]*  
Foreperson.

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8/15/12 - Filed Indictment.  
\* Case assigned to Judge Oetken  
Judge Rusk  
U.S. M.D.